



# STATE OF TENNESSEE WAIVER REQUEST

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## **Waiver Subject:**

Individual Training Account for At-Risk In-School Youth

## **Statutory and Regulatory Requirement:**

Tennessee is seeking a waiver of 20 CFR 681.550 TEGL 3-15 and WIOA Section 129(c)(2)(D) that allows Individual Training Accounts (ITA) for in-school youth (ISY) ages 16-24.

## **Background:**

Tennessee has served both in-school and out-of-school youth (OSY) since the inception of WIOA. With the economy of Tennessee improving and the unemployment data at 3.2 percent (3.2%) as of December 2017, workforce development can effectively use this situation to connect with employers to provide ITAs to at-risk ISY. This juncture of low unemployment in the state will enable the at-risk youth to cultivate their skills in a work-educational environment and give them direction of what they want to do once they leave school. The Individual Training Account provides the at risk youth a wide variety of choices for skills development with an employer. Including enrollment in a community college providing classroom training coupled with a hands on experience for a successful employment in the area the youth will excel.

## **Waiver Request:**

Request to allow Tennessee to provide ITAs to at-risk ISY and to provide work-based training opportunities, including pre-apprenticeships, along with high-quality occupational training.

## **Reason for the Request:**

Youth determined at-risk by the educational institution are not given an opportunity to develop work-skills through the use of work-based training services. Providing ITAs for these at-risk youth will lead to a high school diploma or industry recognized credential and result in skills development including employment opportunities leading to self-sufficiency. It will also decrease the number of school drop-outs in the state.



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## **Actions Undertaken to Remove State or Local Statutory or Regulator Barriers:**

Currently, no state or local statutory or regulatory barriers exist. The State of Tennessee regulation and policy statements are in compliance with current federal law.

## **Goals and Outcomes:**

- Increase the number of at-risk youth receiving ITAs in work-based programs especially pre-apprenticeship programs
- Help companies to develop new skills based on the need of business to develop young talents
- Promote sufficient pre-apprenticeship programs that youth can access
- Positive impact on all youth to attend pre-apprenticeship or any of the work based services needed to close the gap in talent shortage, while providing hands on experience for youth
- Creates a pipeline of well-educated skilled workers entering the workforce to strengthen the State's overall economy

## **Individuals impacted by this Waiver:**

- Tennessee's Local Workforce Development Boards (LWDBs) that provide quality pre-apprentice services tied to demand occupations in the area.
- At-risk youth who will be positively impacted and who will be given an additional avenue that will enrich their livelihood when entering the workforce.

## **Description of the Monitoring Process:**

- Tennessee Department of Labor and Workforce Development (TDLWD) and LWDBs will be responsible for monitoring ITAs and the type of pre-apprentice services provided to at risk youth during the annual monitoring on site and desk top review.
- Ensure work-based training programs are high-quality and meeting industry needs in conjunction with Tennessee Department of Education (Pathways TN).

## **Opportunity for Local Boar and Public Comment on Waiver Request:**

The waiver request will be posted on the TDLWD's website for thirty (30) days and for public review and comment, and for comments from our partners. Consistent with general waiver request requirements, TDLWD is adhering to publication requirements to ensure



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the broadest participation possible including informing appropriate youth program partners such as schools, labor and community-based organizations. This waiver has is developed in consultation with LWDBs.

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